UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BOSTON DIVISION

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

JOINT MOTION TO FILE UNDER SEAL LETTERS REGARDING PRODUCTION OF REVIEWER COMMENTS

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Plaintiff Students for Fair Admissions, Inc. ("SFFA") and Defendant President and Fellows of Harvard College ("Harvard") hereby jointly move this Court for an order sealing in their entirety the letters each side plans to submit in response to the Court's invitation in its sealed January 12, 2017 Order to provide proposals regarding the production of reviewer comments (Dkt. 243). The parties are filing their letters pursuant to that sealed order, and the letters contain references to information designated as confidential by Harvard relating to Harvard's admissions process.

The parties request that the documents subject to this motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, the parties' submissions should be returned to the undersigned counsel upon resolution of this matter.

WHEREFORE, SFFA and Harvard respectfully request that the Court grant this motion and allow each party to file under seal in their entirety the letters regarding the production of reviewer comments, which will be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

/s/ Felicia H. Ellsworth

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Dated: February 2, 2017 Counsel for Defendant President and Fellows of Harvard College

By: /s/ Patrick Strawbridge

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CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a)(2), I hereby certify that SFFA joins in this motion and consents to the requested relief.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Felicia H. Ellsworth Felicia H. Ellsworth